BSEE

Bureau of Safety and Environmental Enforcement

NATIONAL POTENTIAL INCIDENT OF NONCOMPLIANCE (PINC) AND GUIDELINE LIST

PREFACE

LAST UPDATE May 2015

The Offshore Safety Improvement Branch (OSIB) of the Office of Offshore Regulatory Programs (OORP) wish to extend our appreciation to all participating BSEE personnel and especially the District representatives for their dedicated effort and expertise in providing BSEE Inspection Program with this edition of the National PINC and Guideline List.

Revisions to Guidelines for the National PINC List

The following format is presented as a means for BSEE personnel to suggest revisions to the Guidelines to the National PINC List. All suggested revisions will be reviewed by the PINC List Revision Work Group. Before revisions are included in the National PINC List they will be routed to the Regional Supervisors/Field Operations, or their staff, for review and comment. Please submit suggested revisions by email to pincteam@bsee.gov or by mail to:

Bureau of Safety and Environmental Enforcement
PINC List Revision Work Group Offshore Safety Improvement Branch
Mail Stop – VAE-ORP
45600 Woodland Road
Sterling, VA 20166

Suggested Revision Format:

PINC Number:
Enforcement Action:
Definition:
Inspection Procedure:
If Noncompliance Exists:
Inspection Form:
Rationale:

Please be advised:

The guidelines in this document are to be considered the most preferable way of implementing the inspection and enforcement of each PINC and not intended as a directive or to supersede the regulatory language of Title 30 of the Code of Federal Regulations.

Also, the enforcement status of a Facility Shut-in (S) INC or a Component Shut-in (C) INC may not necessarily require the full extent of the enforcement specified. The Inspector has full authority to use their discretion when issuing a Component Shut-in (C) INC. **However, when issuing a Facility Shut-in INC the Inspector must solicit approval from the District Manager or Supervisory Inspector prior to the actual shut-in of a facility.** The only exception to this requirement is when there is an imminent danger to personnel, property, or the environment, exacting a more immediate BSEE response.

DESCRIPTION OF THE GUIDELINES TO THE NATIONAL PINC LIST

The Guidelines to the National PINC List establish the procedures for the inspection of lessee operations and facilities by BSEE personnel. The use of these guidelines for all inspections will result in an inspection program that is both fair and consistent in all OCS waters. The information provided in the Guidelines to the National PINC List is shown in the following outline of the format:

PINC NUMBER: A unique identifier for the specific requirement.

PINC STATEMENT: The clear and concise description of the requirement.

AUTHORITY: The regulatory authority as found in the Code of Federal Regulations.

ENFORCEMENT ACTION: This is the enforcement action(s) that must be taken by BSEE for an identified violation(s) of the regulations. Enforcement action(s) may result in a complete facility shut-in (S), a component shut-in (C), or a warning (W). A substantial number of the Potential Incidents of Noncompliance (PINCs) provide enforcement actions in all three enforcement categories [W/C; W/C/S]. Multiple enforcement action(s) [W/C; W/C/S] may be issued to document severity of identified violations. When multiple enforcement actions [W/C or W/C/S] are provided in the PINC, the criteria for each level of enforcement action are provided in the "IF NONCOMPLIANCE EXISTS" section of the PINC.

RATIONALE/NOTE: Additional information describing the basis or providing background information pertinent to the requirement stated in the "PINC Statement" block.

DEFINITION: Definitions of terms used in the PINC.

INSPECTION PROCEDURE: Preferred detailed guidelines to be used by BSEE personnel to ensure that the stated requirement is met. **However**, **the guidelines in this document are to be considered the preferable method of implementing the enforcement of each PINC and not intended as a directive or to supersede the regulatory language in the Code of Federal Regulations.**

INSPECTION COUNT: Describes the number of items checked to be entered on the inspection form. An incident of noncompliance (INC) must be issued to document any negative (no) answer to a PINC statement.

Examples:

1. **Enter one item checked per facility inspected.**
One (1) is entered in the "# CK" column on the inspection form and answered one [1] in the "#Y" or "#N".

2. **Enter one item checked for each safety device inspected.**
A total count of the number of safety devices, components, wells, etc., is entered in the "#CK" column on the inspection form. The total entries in the "#Y", "#N", and "#N/A" columns must correspond to the total count in the "#CK" column.

IF NONCOMPLIANCE EXISTS: Describes the specific enforcement action to be taken for each identified violation and the severity level of each violation of the regulations. Examples:

1. Issue a warning (W) incident of noncompliance when the situation poses no immediate danger to personnel or equipment.
2. Issue a component (C) incident of noncompliance for a specific piece of equipment or location when it is determined to be part of an unsafe situation or it poses an immediate danger to personnel or other equipment and it can be shut-in without affecting the overall safety of the facility.
3. Issue a structure (S) incident of noncompliance when the unsafe situation poses an immediate danger to the entire facility or personnel and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

INCIDENT(S) OF NONCOMPLIANCE TO BE ISSUED/ INC COUNT: Dictates the specific number of incident(s) of noncompliance to be issued for identified violation(s) of the regulations. Examples:

1. Issue one incident of noncompliance for each facility inspected.
One (1) incident of noncompliance is issued on each facility inspected with detailed bullet descriptions of the identified violations. Exception to the one incident of noncompliance per facility inspected rule is when multiple enforcement actions [W/C or W/C/S] are provided in the PINC. PINCs with multiple enforcement action(s) [W/C; W/C/S] may dictate that multiple incidents of noncompliance are issued per facility to document severity levels of violations. Such cases will result in the issuance of one incident of noncompliance for the appropriate selected enforcement action with detailed bullet descriptions of the identified violations.

2. Issue one incident of noncompliance for each safety device inspected.
One (1) incident of noncompliance is issued for each safety device, component, well, etc., that is determined to be in violation of the regulations.

Should an immediate shut-in increase the risk to safety or pollution, a statement on the INC shall indicate when the shut-in is to take effect. In an after-the-fact situation where no correction is possible, a warning (W) INC will normally be issued, since a shut-in would serve no useful purpose. However, an after-the-fact INC that may result in Civil Penalty Review (CPR) recommendation should be issued with the appropriate shut-in enforcement action. Should an immediate shut-in increase the risk to safety or pollution, a statement on the INC shall indicate when the shut-in is to take effect. In an after-the-fact situation where no correction is possible, a warning (W) INC is issued, since a shut-in would serve no useful purpose.

ACRONYMS USED

Enforcement Actions

W Warning
C Component Shut-in
S Facility (Platform/Rig) Shut-in

Documents Referenced

ASME BPVC	ASME Boiler and Pressure Vessel Code
ANSI/ASME SPPE-1	Quality Assurance and Certification of Safety and Pollution Prevention Equipment Used in Oil and Gas Operations
ANSI Z88.2	Practices for Respiratory Protection
API RP 2D	API Recommended Practice for Operation and Maintenance of Offshore Cranes
API RP 13B	API Recommended Practice Standard Procedure for Field Testing Drilling Fluids
API RP 14B	API Recommended Practice for Design, Installation, Repair and Operation of Subsurface Safety Valve Systems
API RP 14C	API Recommended Practice for Analysis, Design, Installation and Testing of Basic Surface Safety Systems for Offshore Production Platforms
API RP 14F	API Recommended Practice for Design and Installation of Electrical Systems for Offshore Production Platforms
API RP 14G	API Recommended Practice for Fire Prevention and Control on Open Type Offshore Production Platforms
API RP 500	API Recommended Practice for Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Class I, Division 1 and Division 2
API RP 505	API Recommended Practice for Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Class I, Zone 0, Zone 1, and Zone 2

Documents Referenced (cont.)

API RP T2	API Recommended Practice for Qualification Programs for Offshore Production Personnel Who Work with Anti-pollution Safety Devices
ASME B30.4c	Portal, Tower, and Pedestal Cranes

Other Acronyms:

ANSI	American National Standards Institute
APD	Application for Permit to Drill
API	American Petroleum Institute
APM	Application for Permit to Modify
ASME	American Society of Mechanical Engineers
ATC	Automatic Temperature Compensator
ATG	Automatic Temperature Gravity
Bar	1×10^6 dynes per square centimeter
bbl	Barrel
BDV	Blowdown Valve
BOP	Blowout Preventer
BSL	Burner Flame Detector (burner safety low)
BSEE	Bureau of Safety and Environmental Enforcement
ccs	Cubic centimeters per second
CFR	Code of Federal Regulations
DOCD	Development Operations Coordination Document
EOR	End of Operations Report
ESD	Emergency Shutdown
FSL	Low Flow Sensor (flow safety low)
FSV	Flow Safety Valve (check valve)
gpm	Gallons per minute
hp	Horsepower
H_2S	Hydrogen Sulfide
ID	Identification
INC	Incident of Noncompliance
PINC	Potential Incident of Noncompliance
LEL	Lower Explosive Limit
LSH	Level Safety High (high level sensor)
LSL	Level Safety Low (low level sensor)
MAOP	Maximum Allowable Operating Pressure
MASP	Maximum Anticipated Surface Pressure
MODU	Mobile Offshore Drilling Unit
MPMS	Manual of Petroleum Standards
MWD	Measurement-while-drilling
OCS	Outer Continental Shelf
od	Outside diameter

Other Acronyms (cont.):

^{o}F	Degrees Fahrenheit
pcf	Pounds per cubic foot
PFD	Personal Flotation Device
pH	Measure of acidity and alkalinity (potential of hydrogen)
POE	Plan of Exploration
ppg	Pounds per gallon
ppm	Parts per million
PSH	Pressure Safety High (high pressure sensor)
psi	Pounds per square inch
psig	Pounds per square inch gauge
PSL	Pressure Safety Low (low pressure sensor)
PSV	Pressure Safety Valve (pressure relief valve)
PTO	Power Take off
SAC	Safety Analysis Checklist
SAFE	Safety Analysis Function Evaluation
SCADA	Supervisory Control and Data Acquisition
SCSSV	Surface Controlled Subsurface Safety Valve
SDV	Shutdown Valve
SITP	Shut-in Tubing Pressure
SO_2	Sulfur Dioxide
SSCSV	Subsurface Controlled Subsurface Safety Valve
SSSV	Subsurface Safety Valve
SSV	Surface Safety Valve
TSE	Temperature Safety Element (fusible material)
TSH	Temperature Safety High (high temperature sensor)
TSL	Temperature Safety Low (low temperature sensor)
TVD	True Vertical Depth
USV	Underwater Safety Valve
UV	Ultraviolet
WOC	Waiting On Cement
WP	Working Pressure

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